

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

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United States of America

Plaintiff,

v.

Arkady Pavlovich Pichurin,

Defendant.  
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**AFFIDAVIT OF JAY S. ADKINS IN  
SUPPORT OF DEFENDANT'S  
POSITION REGARDING  
SENTENCING**

STATE OF MINNESOTA    )  
                                      ) SS.  
COUNTY OF OLMTED    )

I, Jay S. Adkins, under penalty of perjury state as follows:

1. I am counsel for Defendant in the above-noted matter and I make this affidavit in support of Defendant's position regarding sentencing.
2. Attached hereto as **Exhibit A** is a true and correct copy of a letter from John Schmitt, M.S., Licensed Professional Clinical Counselor with CORE Professional Services, P.A.
3. Attached hereto as **Exhibit B** is a true and correct copy of a letter from Pavel Pichurin, Mr. Pichurin's father.
4. Attached hereto as **Exhibit C** is a true and correct copy of a letter from Nicolette Roy, Mr. Pichurin's significant other.

I declare under penalty of perjury that everything stated in this document is true and correct.

Dated: March 11, 2022

/s/ Jay S. Adkins  
Jay S. Adkins



CORE Professional Services, P.A.

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March 9, 2022

Brad Rupprecht, U.S. Probation Officer  
U.S. Probation  
300 South 4<sup>th</sup> Street, Suite 406  
Minneapolis, MN 55415

**RE: Arkady Pichurin (DOB: 09/08/1994)**

Dear Mr. Rupprecht,

I am writing in regard to Arkady Pichurin. As you know, Arkady is currently involved in outpatient sex offender treatment with CORE Professional Services, PA. Arkady was seen for his Psychosexual Evaluation (PSE) on 03/22/2021 & 03/25/2021. His group therapy intake was completed on 05/18/2021 and he first attended group therapy on 06/03/2021.

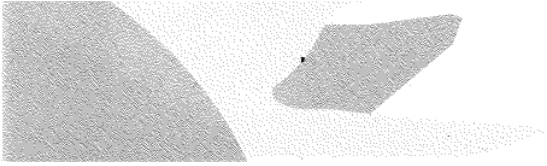
Arkady Pichurin has attended 37 group therapy sessions thus far, and presented 22 cognitive behavioral treatment assignments from *The Best Version of You* created by Frank Weber, LP. All 22 assignments were accepted. Arkady has taken responsibility for his sexually abusive behavior throughout his time in treatment. He has remained compliant and attended and participated in all treatment sessions. He has not used any absences and is often early to his sessions with this writer. Most recently, Arkady has become an active group participant and delivers adequate feedback to his peers regarding their presented treatment assignments. Arkady has also followed the recommendations from his PSE. For example, he has seen a psychiatrist and has remained medication compliant, in addition to attending his monthly consultations with his prescribing doctor. Arkady has been walking, daily, for exercise to cope with any feelings of anxiety or depression. He continues to be honest with this writer and his peers in group regarding his mental health and seems motivated to cope with his mental health concerns appropriately.

Arkady completed a sexual history polygraph examination with Bob Berg on 03/07/2022. No significant response or deception was indicated, demonstrating he is honestly addressing his sexually abusive behaviors in treatment. Arkady has taken responsibility for additional sexual behaviors and is motivated and willing to complete additional course work to bring resolution to these sexual issues. He has gained insight into his sexually abusive behaviors, deviant attractions, pornography addiction, and has consistently demonstrated responsibility for these issues.

Please feel free to contact me at (507) 276-3423, should you have any additional questions regarding this matter.

Respectfully submitted,

John Schmitt, M.S.  
Licensed Professional Clinical Counselor



To Chief Judge John R. Tunheim:

It is a very special and probably the happiest moment when new life arrives, especially the 1st child, as Arkady was. He was a very happy, smart and energetic toddler, loved by everyone.

Despite being mostly exposed to English speaking environment, he learned to read in Russian somewhat between 3 and 5 years of age. He enjoyed painting, reading, playing musical instruments, school, sports, interactions with his younger brother and sister.

At one point early in elementary school, a teacher has raised some concerns. It has been a long time and we do not recall the details, but believe it was mostly about his academic performance. This was surprising to hear since academically, he was doing well previously. We believe eventually he underwent some sort of evaluation which did not show any significant deficiencies, and no interventions needed. He was back to his baseline after the teacher changed.

He continued to enjoy learning, music, various sports. He excelled in swimming and was on school swim team along with his brother. Then he found a new passion in martial arts, had progressive achievements.

In high school he had volunteered in the hospital.

Few to several years ago Arkady had less communication with the parents but continued to be the same with his siblings and peers. We attributed this to a typical teenager changes.

He left our home several years ago and we were glad to see that he was able to fully support himself and his education.

It was shocking to learn what have happened over a year ago now. This is when we have met with his girlfriend Nicolette. It is hard to describe how grateful we are that she has listened to him, continued to be around and immensely supportive ever since.

We have noticed tremendous transformation of Arkady in all positive ways over the last year. It seems he is not only back to his baseline but revealed some not so obvious previously qualities. We wish this transformation would have happened without the event from his actions which ruined his life and affected other people. We are grateful to Nicolette, to his treatment team for this transformation.

He has had our love and support during this difficult period of his life. He can count on us at any time, and hopefully we will be around to support him in the future.

Sincerely,

Pavel and Oksana Pichurin

# Exhibit C

To Whom It May Concern,

I am writing on behalf of Arkady Pichurin, with whom I have had a close relationship for about two years now. We started dating back in May of 2020, before he had been arrested. Knowing him before and now since after, I can see how much he has grown and changed as a person. Prior to him being charged, he had a very closed personality; he did not like talking about his feelings and would tend to shut down and have very depressive episodes. It was hard to get him to speak, and he would usually walk away from the conversation. I could tell he needed help but didn't realize to what extent.

Shortly after everything came out, and he got charged, he went to a very dark place, and we were all very concerned for his well-being. His lawyer helped him find the program Core, which he started of his own free will. He was very nervous about starting it but seemed more hopeful. After just a couple of sessions, I could see a change. The therapist that runs his sessions encouraged him to see a psychiatrist for his depression which he then sought out. He has been on antidepressants now and has made a world of difference in his mood. He has gone from someone who never wanted to talk to telling me everything. He wants to tell me about his assignments during his sessions, his mood for the day, and how he's progressing and coping with this situation. I don't have to ask or pry; he just starts talking about his emotions and what he's feeling in the moment.

During Arkady's group sessions, he has an assignment book and a notebook he writes in. He started writing down different emotions he's expressing and how he is coping with what he has done. He has gone through shame, guilt, depression, anxiety, to name a few. I remember him writing something along the lines of "I would never want to hurt anyone, especially not a child, but yet I have." He realizes what he has done and comprehends the pain he has caused. He wants

to be a better person, and I know he can be. He has shown how much he wants to get help. He knows he can change now and isn't afraid of doing the hard work. He has more support now from group members that have had similar experiences, his family, and myself.

I will always be there to support Arkady because even though what he has done is wrong, I believe he is a good person. He is kind, thoughtful, and has such a big heart. I am very proud of all the hard work he has put into himself so far and his willingness to be completely vulnerable with me. He has become a changed person from the first day I met him. I know he will do everything in his power to continue to get help and strive to be the best version of himself.

Sincerely,

Nicolette Roy